

April 11, 2011

Re: Aetna Life Insurance Co.

Aetna Tracking Numbers: CA-2010-11, CA-2010-12

State Tracking Numbers: PF-2010-02367, PF-2010-02396

Responses to the questions provided on March 21, 2011 are discussed below.

Separate rate filing forms for the two filings are being provided.

The exhibits for questions 4 and 7b have been revised to include the aggregate impact of area factor changes as a trend change.

An updated rate development exhibit has been provided. This exhibit is based on data for 2010 paid through February 28, 2011. This exhibit is intended to support the filings effective April 1, 2011. A similar exhibit will be provided for the July 1, 2011 filing.

Premium duration: The durational factors we used for the projections accompanying these rate filings are intended to reflect the impact of underwriting wear-off. As stated on page 4 of Milliman's report (http://www.soa.org/files/pdf/IH%20Durational%20Study_Final%201006.pdf), the factors were based on data that had been normalized to reflect a constant demographic profile. It is our understanding that these factors reflect the impact of changes in claims levels excluding any changes that result from changes in underlying population demographics (which we assume to have an equal impact on claims and premiums). Further, the adjustment to use 80% of the slope of the Milliman factors was partially intended to remove the impacts of anti-selective lapsation. In effect, we believe the durational factors used to estimate the impact of underwriting wear-off have been appropriately adjusted to exclude impacts of aging and changes in average underwriting class that are expected to have an offsetting impact on both claims and premiums. As such, no adjustment for durational influences on premiums is required.

MLR Projections: An exhibit was provided on April 6. This exhibit is applicable to the rate filings effective April 1 and July 1.

2010 Capital and Surplus for CA health business: We are looking into the availability of this information and will confirm timing in the next few days.

2010 Executive Compensation: A summary of 2010 executive compensation (as found on pages 56-58 of Aetna's 2011 Proxy Statement) accompanies this response.

Exhibits for questions 17 and 19bc: There are two differences between the exhibits. One is the use of data paid through 12/31/2010 vs. data paid through 2/28/2011. The second is a formula problem in the report underlying this analysis that led to the exclusion of some historical facility claims. We are providing an updated version of the exhibit for question 17 reflecting corrections to the model and incorporating the two additional months of claims run-out. The trends in this updated exhibit are consistent with those previously provided in the response to question 19.